

Remarks

Reconsideration of the above-captioned application is respectfully requested. All pending claims (1-11) have been rejected as being anticipated by Deerwester.

To overcome the Examiner's rejections, independent apparatus claim 1 has been amended to specify that hyperlinks are established between at least some of the entities and that at least one affinity value depends at least in part on at least one hyperlink. Support for this amendment can be found in the specification on page 6, lines 25-27. New Claim 12 specifies that the affinity values are not constrained to be symmetric. Support for this claim can be found in the specification on page 6, lines 15-16. Further, new Claim 13 recites that the affinity values are not based on content of the entities alone. As but one example, the affinity values can be based at least in part on links between entities, as set forth in the specification on page 6, lines 25-27. Claims 1-13 are now pending.

Rejections Under 35 U.S.C. §102

Claims 1-11 have been rejected under 35 U.S.C. §102(e) as being anticipated by Deerwester, which teaches a method for revealing information structures in a collection of data items. The data items considered by Deerwester are distinct documents that have no hyperlinks between them, but rather that share common terms with each other.

In contrast to Deerwester, as now amended Claim 1 specifies that at least one affinity value depends at least in part on at least one hyperlink. As mentioned above, the Deerwester relationships depend only on the occurrences of common terms, with the concept of affinities being based on non-term factors such as hyperlinks being completely absent in Deerwester. By accounting for, e.g., hyperlinks, the present invention

would return affinities between closely related Web documents even if the documents contained no common terms, whereas Deerwester evidently would not. Accordingly, Applicants believe that Claim 1 and its respective dependent claims are now patentable over Deerwester.

With respect to new Claim 12, Deerwester's affinity values appear to be constrained to be symmetrical, in contrast to Claim 12. In other words, Deerwester apparently has no reason to consider the use of anything other than symmetrical affinity values. The affinity values of Claim 12, on the other hand, are not constrained to be symmetrical and indeed would be expected to be asymmetrical when, e.g., hyperlinks are used. For this reason, it appears to Applicants that Claim 12 is patentable.

New Claim 13 requires that the affinity values need not be based on content (i.e., term count information) of the entities alone, a concept that does not appear to be taught or suggested by Deerwester. Accordingly, Claim 13 appears to be patentable.

Applicants respectfully assert that the presently claimed invention is patentably distinct from the cited references, and Applicants therefore request that the present rejections be withdrawn and the instant application passed to allowance. The Examiner is cordially invited to telephone the undersigned at (619) 338-8075 for any reason which would advance the instant application to allowance.

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Respectfully submitted,



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